

REMARKS

The Examiner is thanked for his careful and very thorough Office Action. The Examiner is particularly thanked for the helpful suggestions regarding correction of the alleged informalities.

Claims 1-7 have been rejected.

Note that the amendments to Claims 1 and 3-5 are intended to be purely formal amendments, and are believed not to change the scope of these claims.

Claims 8-35 have been added. Support for Claims 8-35 is essentially the same as that for Claims 1-5, but the added claims are directed to methods and systems for computer graphics system operation according to the disclosure of the application as filed. The support for Claims 8, 13, 14, 17, 21, 22, 25, 29, 30, and 33 can be found, for example, in paragraph [0025]. The support for Claims 9, 15, 16, 23, 24, 31, and 32 can be found, for example, in paragraph [0024]. The support for Claims 12, 20 and 28 can be found, for example, in paragraph [0206]. The support for Claims 10, 11, 18, 19, 26, 27, 34, and 35 can be found, for example, in paragraph [0162] and Figure 1D. The new claims are respectfully asserted not to introduce new matter, and their entry is respectfully requested.

The foregoing amendments to the specification are submitted to improve clarity, and to remove various typographical and other minor informalities. These changes are respectfully asserted not to introduce new matter, and their entry is respectfully requested.

Art Rejections

The art rejections are all respectfully traversed.

Review of the References

Baldwin (U.S. Patent No. 6,025,853) relates to a processing chip that uses a deep pipeline of multiple asynchronous units to achieve a high net throughput in 3D rendering.

Brent et al. (U.S. Patent No. 5,459,864) relates to load balancing, recovery and reconfiguration control for a data move subsystem.

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If the undersigned attorney has overlooked a relevant teaching in any of the references, the Examiner is requested to point out very specifically where such teaching may be found.

Rejection Under 35 USC 103(a)

Claims 1-7 stand rejected under 35 USC Section 103(a) as being unpatentable over *Baldwin* in view of *Brent et al.*

Claims 2 and 6 have been canceled without prejudice by the above amendment. The rejection of these claims is traversed and is now believed to be moot.

The asserted combination of references does not support each limitation of Claim 1. Specifically, Claim 1 recites "a plurality of parallellized graphics computational units; and one or more task allocation units programmed to bypass defective ones of said subunits within said groups, and to distribute incoming tasks only among operative ones of said subunits".

Brent et al. does not disclose or suggest one or more task allocation units to bypass defective graphics computational units and to distribute incoming tasks only among operative graphics computational units. The Examiner has correctly noted that *Brent et al.* teaches a load balancing, error recovery and reconfiguration control in a *data movement subsystem with cooperating plural queue processors*. An input/output processor is not the same thing as a graphics computational unit. Accordingly, data movement within cooperating queue processors is not the same thing as distributing incoming tasks among operative graphics computational units.

As determined in *Thrift*,¹ a rejection which "does not discuss the unique limitations" of the claims was held to be "simply inadequate on its face." In this case, a rejection was held "not supported by substantial evidence because

¹ *In re Thrift*, 298 F.3d 1357 (Fed.Cir. 2002).

the cited references do not support each limitation of claim 11." See *In re Vaeck*, 947 F.2d 488, 493, 20 USPQ2d 1438, 1443 (Fed. Cir. 1991).² Therefore, a prima facie case of obviousness has not been established by the Examiner.

Therefore, even if one were motivated to make the asserted combination (which Applicant strongly disputes), the limitations of Claim 1 still would not be supported by the asserted combination.

Finally, dependent Claims 3-5 and 7 depend directly from independent Claim 1 and incorporate all the limitations thereof.

Thus, for the reasons discussed above, Applicant respectfully requests withdrawal of this rejection.

Conclusion

Thus, all grounds of rejection and/or objection are traversed or accommodated, and favorable reconsideration and allowance are respectfully requested. The Examiner is requested to telephone the undersigned attorney or Robert Groover for an interview to resolve any remaining issues.

Respectfully submitted,



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² *In re Thrift*, 298 F.3d at 1366 (emphasis added).